

1 A. I think she is.

2 Q. Let me ask you this, I haven't ask you  
3 this: Physically describe Larry Meade for me,  
4 please.

5 A. Five nine, five ten, medium build.  
6 Sometimes he wears glasses; sometimes he  
7 doesn't. Thinning hair. Just an average Joe.

8 Q. How old is he?

9 A. I think he's in his 50s.

10 Q. And Jill, describe her for me, please.

11 A. Jill is probably five one. She has  
12 very short blondish red hair, real pleasant  
13 looking. She's on the heavy side. Dresses  
14 wonderful, very particular about her  
15 appearance.

16 Q. Is that everything that Jill told you  
17 that day?

18 A. Yeah.

19 Q. Did you tell her anything about what  
20 had been happening with Larry?

21 A. Yes.

22 Q. At that point, what did you tell her?

23 A. I told her he kept following me around  
24 and telling me similar things to what she was  
25 saying that happened to her.

1 Q. You just testified that she said he  
2 asked her out. Did Larry ever ask you out?

3 A. No.

4 Q. Did you tell Jill that Larry had tried  
5 to kiss you?

6 A. No.

7 Q. Did you tell Jill that Larry had put  
8 his hands on the top of your butt?

9 A. No.

10 Q. No?

11 A. No.

12 Q. Did you tell Jill that you and Larry  
13 had a friendly relationship?

14 A. Yeah.

15 Q. Did you tell Jill that you and Larry  
16 would sometimes hug one another?

17 A. No.

18 Q. Did Jill say that Larry had ever hugged  
19 her?

20 A. No.

21 Q. Did Jill say that Larry had ever tried  
22 to kiss her?

23 A. No.

24 Q. Did Jill say that she and Larry had  
25 ever exchanged mutual hugs?

1 A. No.

2 Q. Did she say when this happened?

3 A. After the death of her husband.

4 Q. When did her husband die?

5 A. I don't know. That's just what she  
6 said to me, after the death of my husband,  
7 which I don't know when that was.

8 Q. Anything else -- this is March of 2003,  
9 you said?

10 A. Yeah.

11 I have to back up because I'm getting  
12 things -- I'm going ahead of myself. My son  
13 racing go-carts took his go-cart out to the  
14 Cranberry Mall for a show.

15 Q. Can I ask you a question here? Are we  
16 talking about the Cranberry Mall -- are there  
17 two Cranberry Malls in western Pennsylvania?

18 A. Yes.

19 Q. Okay. Are both of them somewhere along  
20 79?

21 A. No.

22 Q. Okay.

23 A. This one is across from the Wal-Mart  
24 that is in Seneca, Pennsylvania.

25 Q. So when you talk about the Cranberry

1 Mall, you're not talking about the Cranberry  
2 Mall I'll just say closer to Pittsburgh in the  
3 Wexford area?

4 A. No.

5 Q. Okay. Thanks.

6 You were telling me about your son's  
7 go-cart at the Cranberry Mall.

8 A. Yes.

9 Q. What month are we talking about and  
10 what year?

11 A. The first of March.

12 Q. What year?

13 A. 2003.

14 Q. Okay. I interrupted you.

15 A. Okay. We had taken the go-cart out --  
16 you have to take it out after the store closes.  
17 So we got it out there; and then it's out there  
18 from Thursday, Friday, Saturday and Sunday; and  
19 after the mall closes on Sunday is when you  
20 take all the cars out.

21 Q. So that there are go-carts on display?

22 A. Yes, and racecars.

23 Q. Forgive me. Are these motorized?

24 A. Yes.

25 Q. Not pedal cars?

1 A. No, they're motorized.

2 Q. And they're actually something that you  
3 get in and drive?

4 A. And drive, yes.

5 Q. We're not talking about Boy Scout  
6 Pinewood Derby?

7 A. No.

8 Q. Okay. Thank you.

9 So they're on display?

10 A. Yes.

11 Q. Is it a contest?

12 A. No, it's not a contest. It's the  
13 beginning of the season of racing and the guys  
14 that want to -- women do it, too, that if you  
15 want to display your car and show off what  
16 you're racing; and you usually have your  
17 sponsors on the sides of the cars, you have  
18 your previous winnings. If you have trophies  
19 or ribbons or anything, you display those.  
20 It's just a nice, little thing for the  
21 beginning of the season for the guys.

22 Q. It kicks off the racing season?

23 A. Yeah. It's just a fun event.

24 Q. And it's something that Jonathan  
25 participates in?

1           A. Yes; and you get your picture taken  
2 with your car. You get put in the paper. It's  
3 just a neat little thing for the guys that  
4 race.

5           Q. So what dates did you say the cars were  
6 displayed?

7           A. It was the first weekend of March. It  
8 was Thursday, Friday, Saturday and Sunday. I  
9 can't remember if it's the 2nd, 3rd, 4th, 5th  
10 or it's the 6th, 7th, 8th, 9th, something like  
11 that

12          Q. All of the days, the Thursday, Friday,  
13 Saturday and Sunday, were all in March?

14          A. Yes.

15          Q. It didn't tail off February?

16          A. No.

17          Q. In March?

18          A. Yes, it was in March.

19          Q. What happened?

20          A. Okay. Let's see. Jonathan and Harold  
21 and I were all out there Friday night having a  
22 good time with some friends, went and ate; and  
23 then Saturday we went back out because Jonathan  
24 was getting his picture taken.

25          Q. Went back out to the mall?

1           A. Yeah, went back out to the mall; and  
2 then the guys decided Sunday they were going to  
3 leave a little early because you have to wait  
4 till the mall closes on Friday to get your cars  
5 and carts out of there.

6           Q. On Friday?

7           A. I mean on Sunday. Sorry, Sunday. And  
8 so they left approximately between 4 and 4:30  
9 to be out there.

10          Q. They left home?

11          A. Yes, they left home. It takes them 20,  
12 25 minutes to get there from our home.

13                 In that time that they went to do that,  
14 I went to Shop N'Save to pick up some  
15 groceries.

16          Q. How far is Shop N'Save from your house?

17          A. Eight minutes, a real short distance.

18                 I come home, it was probably around  
19 5:00. I come home and I'm putting the  
20 groceries in the house, taking them from the  
21 car into the house; and a car pulls up; and  
22 it's dark out so I had no clue who it was  
23 because I never seen the car before; and so I'm  
24 carrying these groceries in, set them down on  
25 the floor, walked back out; and Larry Meade



1 gets out of the car. I said, what are you  
2 doing here? He goes, I need to talk to you.  
3 Talk to me about what? He goes, I need to talk  
4 to you. And I'm standing there shivering  
5 because it's cold out and it's starting to  
6 rain. I had the last of my groceries in my  
7 hand. He goes, let's just step inside, get out  
8 of this cold. So we stepped right inside my  
9 door and he shut the door behind him.

10 Q. The front door to the house?

11 A. The front door to the house. I said,  
12 what do you want? I can't exactly remember  
13 everything word for word for word that he said,  
14 but I can basically remember most of it. He  
15 started to tell me that he was madly in love  
16 with me, he wanted to marry me, that we could  
17 go off to Florida and have a wonderful time  
18 together, that I didn't need my husband and  
19 son, that he could take care of me, that he had  
20 lots of money.

21 He asked me at that time -- because I  
22 was dumbfounded -- I just stood there. I  
23 didn't say anything. I didn't know what to  
24 say. I didn't know what to think. He said, I  
25 know you are here by yourself and you will be



1 here by yourself for a while. And I asked him,  
2 how do you know that? He said, I just seen  
3 your husband and son out at the Cranberry Mall  
4 getting your son's go-cart. I said, you did?  
5 He said, yeah, they're busy, they won't be home  
6 for a while.

7 Then he proceeded to tell me, he says,  
8 I wanted to tell you how good you looked last  
9 night. I said, how did you even see me or  
10 where were you? He says, you were out at the  
11 mall with Harold and Jonathan. You had on  
12 black jeans, a black leather jacket, black  
13 boots, a teal turtle neck. He described  
14 everything I had on to a T.

15 Q. And he was correct?

16 A. He was correct.

17 He's standing there. I don't have my  
18 coat off. I'm just standing there thinking,  
19 what is going to happen next? I told him, I  
20 said, Larry, you are playing with fire here and  
21 you're not just playing with a little fire,  
22 you're playing with a big, burning bush fire.

23 Q. What did you mean by that?

24 A. That it wasn't something little he was  
25 dealing with here, that he was pushing the

1 wrong buttons.

2 Q. I still don't understand what you mean.

3 A. That he was going overboard with  
4 everything, that this just could not -- this  
5 was something that -- it couldn't be.

6 Q. Do you mean the two of you together?

7 A. Yes. Yes. And he just kept repeating  
8 about he knows that Harold and Jonathan are out  
9 at the mall, that they won't be home for a  
10 while; and he said that we're alone here, they  
11 won't be home for a while, we could easily have  
12 sex right now; and I told him, no, we are not  
13 going to. I said, I love my husband very, very  
14 much. I would do nothing to jeopardize my  
15 marriage to him. I love my son very much. I  
16 already lost one son, I'm not going to lose  
17 another; and told him that -- I said, right now  
18 you're not speaking clearly with your head,  
19 you're speaking out the end of your dick and if  
20 you would right now leave, get out that door  
21 and leave.

22 Q. And did he?

23 A. Yes. When he turned around, he yelled  
24 something about, the next time you see me it  
25 will be at Morrison's Funeral Home; and he

1 slammed the door. He got into his car and I  
2 could hear the wheels squealing.

3 Now, this is after the bathroom  
4 incidents. So I'm pretty sure now the bathroom  
5 incidents were all in February.

6 Q. The bathroom incidents were all in  
7 February, the two?

8 A. Yes.

9 Q. Both the hug touching the top of your  
10 butt --

11 A. Yeah.

12 Q. -- and the attempted kiss, it's your  
13 testimony that they occurred in February of  
14 2003?

15 A. Yes.

16 Q. You're certain of that?

17 A. If I could look at my diary, I could  
18 tell you for certain because I wrote down the  
19 exact time frame.

20 Q. I need your recollection.

21 A. I'm thinking the end of January,  
22 beginning of February the first one. The end  
23 of February the second one.

24 Q. When he is in the house with you, where  
25 are the two of you standing?

1           A. He is standing near the doorway to go  
2 out the front door and I'm further into the  
3 house into the dining room area.

4           Q. Does the front door open to a foyer --

5           A. Yes.

6           Q. -- or does it open right into the  
7 dining room?

8           A. No, opens to a foyer.

9           Q. When you first walk in the door, if you  
10 were to walk straight, where would you go?

11          A. Up a pair of stairs.

12          Q. To the second floor?

13          A. Ah-huh.

14          Q. How many steps are there?

15          A. Twelve, 13.

16          Q. When you walk in the front door, is it  
17 open to the left?

18          A. Yes.

19          Q. Is it also open to the right?

20          A. No.

21          Q. There's a wall there?

22          A. Yes.

23          Q. Is that the outside wall of the house?

24          A. No.

25          Q. What is that wall?

1           A. That wall goes to a closet and a  
2       bedroom.

3           Q. On the other side of the wall?

4           A. Yes.

5           Q. That you get to by going through the  
6       house to the left through the dining room?

7           A. Yeah.

8           Q. And he is standing in that foyer area?

9           A. Yeah.

10          Q. What way is he facing?

11          A. Forward. Like you walk in the door and  
12       you like step to the right and you stand there.

13          Q. Okay. And where are you in the dining  
14       room?

15          A. In the dining room facing the door.

16          Q. Facing the outside door?

17          A. Yes.

18          Q. Facing Larry.

19                 What is Larry wearing?

20          A. Jeans, tennis shoes, a jacket. That's  
21       all I can remember.

22          Q. A hat?

23          A. I don't remember a hat.

24          Q. How far apart are you?

25          A. I'm going to say maybe 13 feet.

1 Q. So at no time is he touching you?

2 A. No.

3 Q. How long does this exchange take place?

4 A. To me it felt like forever, but I know  
5 it wasn't. Five to ten minutes. Maybe not  
6 even that.

7 Q. Was it your testimony it takes 20 to 25  
8 minutes to get from the Cranberry Mall to your  
9 house?

10 A. Ah-huh.

11 Q. Was there any snow on the ground that  
12 day?

13 A. No. It was raining.

14 Q. Was it cold enough for the roads to get  
15 icy?

16 A. No.

17 Q. What time was Larry there?

18 A. I'm going to say around 5:00.

19 Q. After Larry left, what did you do?

20 A. I paced the floor and just kept  
21 thinking and thinking and thinking, what do I  
22 do now, what do I do now?

23 Q. What were you thinking about?

24 A. I just kept thinking, what's he going  
25 to do next? Could he come back here? How am I

1 going to tell Harold this? I've got to talk to  
2 him. I've just got to talk to him.

3 Q. Meaning you have to talk to Harold?

4 A. Yeah. Yeah. Just a lot of things went  
5 through my mind.

6 Q. How long did you pace and think?

7 A. I don't remember. Until Harold come  
8 home.

9 Q. When Harold came home, what did you do?

10 A. I just asked him how did everything go  
11 out at the mall, who did they see, what all did  
12 they do, what did they talk about to the  
13 different people. Just basic stuff.

14 Q. Were you making dinner?

15 A. No. We ate before they left.

16 Q. How long after Larry left did Harold  
17 and Jonathan come home?

18 A. Maybe an hour.

19 (Brief recess.)

20 Q. Mrs. Wakefield, before we took the  
21 break, you had just finished your testimony  
22 relative to the Sunday evening when Mr. Meade  
23 came to your house. You were beginning to tell  
24 me what happened when your husband and son came  
25 home, which you said was at about 5:00; right?



1 bed that night?

2 A. Yes.

3 Q. What happened the next day?

4 A. We both went to work. We come home  
5 from work and I asked Harold if it would be a  
6 good idea if I called my brother.

7 Q. Who is your brother?

8 A. Vincent White.

9 Q. Why did you think it would be a good  
10 idea to call your brother?

11 A. He's a State Police officer.

12 Q. What did Harold say?

13 A. "If you want to, go ahead."

14 Q. Did you?

15 A. Yes.

16 Q. What did your brother say?

17 A. My brother said that he's dealt with  
18 different things like that and it comes down to  
19 -- since there was no witnesses, he said it's  
20 really hard, it's extremely tough, that it's a  
21 she said/he said type situation, that I could  
22 -- since there was no harm done physically, he  
23 said that mainly there was nothing the police  
24 could really do.

25 Q. Was that the extent of your

1 conversation with your brother?

2 A. Yeah.

3 Q. Did you ever discuss the question of --  
4 was the purpose of talking to your brother the  
5 thought that you might press criminal charges  
6 against Larry for having been at your house  
7 that Sunday night?

8 A. Yes.

9 Q. When you were at work the next day, did  
10 you tell anybody what happened? When you were  
11 at work on Monday or Tuesday, did you tell  
12 anybody what happened at your house on Sunday?

13 A. No.

14 Q. Did you tell anybody from HR?

15 A. No.

16 Q. Did you tell your supervisor?

17 A. No.

18 Q. Did you tell Larry's supervisor?

19 A. No.

20 Q. Had you ever told Larry's supervisor  
21 anything that had happened with Larry?

22 A. No.

23 Q. After you spoke with your brother, did  
24 you share what your brother's thoughts were  
25 with Harold?

1 A. Yes.

2 Q. What did Harold say?

3 A. He just basically said that Vincent was  
4 probably correct on that, that it is a tough  
5 situation to deal with, that if I wanted to go  
6 further into it that I could possibly talk to  
7 my neighbor, which is a town cop, and see if  
8 maybe he seen him here, seen the car in the  
9 driveway; but Harold and I never really ended  
10 up talking to our neighbor about it.

11 Q. You never did?

12 A. No.

13 Q. Was that the only time and the last  
14 time you thought about pressing criminal  
15 charges against Larry Meade?

16 A. No. I went down to the Magistrate's  
17 office in Franklin and asked them how I could  
18 get a PFA; and they sent me to a different  
19 office on Lint Street that handles those  
20 situations; and I went there and talked with a  
21 lady, I don't remember her name; and she said  
22 it couldn't happen, it had to be a family  
23 member.

24 Q. Is it your testimony that you went to  
25 Franklin for the purpose of obtaining a PFA

1       against Larry?

2           A.   Yes.

3           Q.   When did you do that?

4           A.   The week that he was at my house.

5           Q.   Which day?

6           A.   I don't remember.

7           Q.   Well, you didn't go Monday; right?

8           A.   No, because I had talked to me brother  
9       on Monday.

10          Q.   Did you go Tuesday?

11          A.   I don't think so.

12          Q.   Did you go Wednesday?

13          A.   It was possibly Wednesday or Thursday.

14          Q.   Would it have been after work?

15          A.   No.   There was a day in there I didn't  
16       go to work.

17          Q.   Which day didn't you go to work?

18          A.   I don't remember.   It was one of those  
19       days.

20          Q.   Why didn't you go to work that day?

21          A.   I just didn't feel good, just didn't  
22       want to deal with everything; and I just had a  
23       lot on my mind and wanted to take care of that  
24       and some other things.

25          Q.   So it was a day that you did not go to

1 work that week that you wanted to attempt to  
2 get a PFA. Did you go alone?

3 A. Yes.

4 Q. Did Harold know you were going to do  
5 that?

6 A. Yes.

7 Q. Was he supportive of that?

8 A. Yes.

9 Q. And what were you told about the reason  
10 why you could not obtain a PFA?

11 A. They said I cannot get a PFA against  
12 him because he does not live in that household.  
13 They're telling me now you can only get PFA's  
14 against people that live in your household.

15 Q. What do you mean they're telling you  
16 now?

17 A. From the time that I went to check on  
18 it that they said that they don't do other  
19 people, that these people have to live in your  
20 household to get PFA's against them.

21 Q. I'm only interested in what you were  
22 told the day you went to get a PFA.

23 A. That's what they told me.

24 Q. That you cannot get a PFA against  
25 anyone unless they lived in your house?

1 A. Yes.

2 Q. Is that the only effort you made to get  
3 a PFA?

4 A. Ah-huh.

5 Q. Did they take any information from you  
6 when you were there regarding your name,  
7 Larry's name and what happened?

8 A. Not that I'm aware of because she said  
9 I couldn't do anything so why take down the  
10 information.

11 Q. How did she know that Larry did not  
12 live in your house?

13 A. Because I told her. Because she asked  
14 me, she said, is he a family member? I said,  
15 no; and she said, where does he live? I said,  
16 in Seneca, Pennsylvania. She says, you can't  
17 do it.

18 Q. And that was the end of the discussion?

19 A. That was the end of the discussion.

20 Q. You didn't tell her what happened?

21 A. No.

22 Q. Do you remember her name?

23 A. No.

24 Q. Can you describe her?

25 A. I'm going to say she was as tall as me,

1 a little bit bigger, curly blondish/brown hair,  
2 real pleasant person.

3 Q. So if we look at your time card pay  
4 records from that week, we'll be able to tell  
5 what day you went to get the PFA because that  
6 was the day that you didn't go to work?

7 A. Ah-huh.

8 Q. Yes?

9 A. Yeah.

10 Q. Okay. What else did you do that day  
11 that you didn't go to work?

12 A. I stayed at the house and moped around.

13 Q. You're relatively certain you didn't  
14 take Friday off; correct?

15 A. I don't know. It could be.

16 Q. So the week came and went. Did you  
17 tell anybody at HR what had happened that week?

18 A. No.

19 Q. Did you tell your supervisor that week  
20 what had happened?

21 A. No.

22 Q. Did you tell anybody at Joy that week  
23 what had happened?

24 A. No.

25 Q. Did you work overtime that weekend?



1 A. No.

2 Q. What happened the next Monday?

3 A. I'm pretty sure I went to work and came  
4 home.

5 Q. Did you tell anybody at Joy that day  
6 about what happened?

7 A. No.

8 Q. At that point, the Monday following --  
9 we'll say now eight days after Larry had been  
10 to your home, were you aware that Joy had a  
11 sexual harassment policy?

12 A. Yes.

13 Q. If you were to have told anyone about  
14 what had happened with Larry, who would you  
15 have gone to?

16 MR. LINDSAY: I don't mean to --  
17 just a question on the form of the question.  
18 Do you mean who she would have gone to if she  
19 was following the policy? Is that what you  
20 mean?

21 MS. COCHENOUR: No. I just want  
22 to know --

23 MR. LINDSAY: Personally?

24 MS. COCHENOUR: No. No.

25 Q. You knew Joy had a sexual harassment

1 policy. If you had decided that you wanted to  
2 tell somebody at Joy what had happened with  
3 Larry Meade, who would you have gone to?

4 A. Either Diane or Cornelia.

5 Q. Diane Kemick in HR or Cornelia also in  
6 HR?

7 A. Ah-huh.

8 Q. Did you know Johan Maritz?

9 A. Yes, I did.

10 Q. Did you know him to see him?

11 A. Yes.

12 Q. Did you know him to speak with him?

13 A. Yes.

14 Q. Are you comfortable with Johan?

15 A. No.

16 Q. Ever?

17 A. I am now that I know him better; but at  
18 that time he was just new so I really didn't  
19 per se know-know him.

20 Q. He didn't make you uncomfortable?

21 A. No.

22 Q. How about your own supervisor, who was  
23 it at that time?

24 A. Wayne Hilliard.

25 Q. Were you comfortable with Wayne?

1 MR. LINDSAY: I just want to  
2 object to the form of the question because  
3 that's such a broad term and I'm concerned that  
4 we'll get an answer that may not be responsive  
5 to what you want because -- comfortable about  
6 reporting it, comfortable about being with him  
7 in a restroom or whatever.

8 MS. COCHENOUR: I'll ask it  
9 again.

10 Q. Would you have been comfortable  
11 reporting Larry Meade's behavior to Wayne  
12 Hilliard?

13 A. No.

14 Q. Do you know who Larry Meade's  
15 supervisor was?

16 A. No.

17 Q. You would have been comfortable then,  
18 your testimony is, to report Larry's behavior  
19 to Diane Kemick who is in HR; correct?

20 A. Yes.

21 Q. Or to Cornelia --

22 A. Yes.

23 Q. -- Adams who is in HR?

24 A. Ah-huh.

25 Q. And at least as of eight days following

1 the day that Larry came to your house, you  
2 hadn't spoken with either one of them about  
3 those incidents; correct?

4 A. Yes.

5 Q. And you hadn't spoken with Diane or  
6 Cornelia about any concerns you had relating to  
7 Larry Meade?

8 A. No.

9 Q. Before we took the break, Mrs.  
10 Wakefield, you referred to a diary that you  
11 kept. Can you tell me what the diary is, how  
12 you kept it and when you started keeping it?

13 A. When I had talked to my brother, he  
14 suggested that I start writing this stuff down  
15 because he said it's very, very beneficial if  
16 you ever need it to log it as you think of it.  
17 He said, you may need information later, he  
18 says, you may not, he says, but if you don't  
19 write it down, it's not there. He said people  
20 tend to forget things so easily.

21 Q. So I'm clear, you spoke with your  
22 brother Vincent on March the 4th?

23 A. Yes.

24 Q. So March the 4th, 2003 is when you  
25 first began keeping what you call your diary;

1 A. Yes.

2 Q. With your permission?

3 A. Yes.

4 Q. I'm going to read a little further.

5 "One day in June 2002 he came to see how I was  
6 doing, gave me a hug and tried to kiss me."

7 Did I read that correctly?

8 A. Yes.

9 Q. Larry Meade only ever tried to kiss you  
10 once; correct?

11 A. Yes.

12 Q. Okay. Is this document correct that he  
13 tried to kiss you in June 2002?

14 A. Yes.

15 Q. So your testimony earlier today that he  
16 tried to kiss you in February or March of 2003  
17 is incorrect?

18 A. Correct.

19 Q. Okay. This document is correct?

20 A. This one is correct.

21 Q. Your testimony earlier today is  
22 incorrect?

23 A. Incorrect.

24 Q. Okay. A little further down in that  
25 same paragraph -- again I'm going to reach over

1 and show you where I'm reading because it's  
2 hard to follow. Right there (indicating).

3 A. Okay.

4 Q. "He then would let 2-3 days pass until  
5 he would talk to me again. I would say 3 weeks  
6 went by and he came to me and said it was his  
7 son's birthday and he felt sad and he needed a  
8 hug. I gave him a hug and his hands started  
9 roaming and grabbed my butt."

10 Is that the same incident that we  
11 talked about earlier today in your testimony?

12 A. Yes.

13 Q. And he only touched your butt once;  
14 correct?

15 A. Yes.

16 Q. And this indicates -- meaning in  
17 Exhibit 1 -- that that occurred about three  
18 weeks after the attempted kiss; am I right?

19 A. Yes.

20 Q. So it would have happened in late June  
21 or early July of 2002; correct?

22 A. Yes.

23 Q. So is this document correct?

24 A. This is correct.

25 Q. So that your testimony earlier today

1 that the hug that resulted in Larry's hands  
2 touching the top of your butt did not occur in  
3 February or March of 2003?

4 A. No.

5 Q. It did not occur in January of 2003?

6 A. No.

7 Q. Correct?

8 A. This is the correct --

9 Q. It happened in late June --

10 A. Yes.

11 Q. -- or early July of 2002?

12 A. Yes.

13 Q. Okay. Your testimony earlier today  
14 about Larry making comments about how pretty  
15 you looked and about asking you about what kind  
16 of underwear you wore and him saying that you  
17 would look good in a bikini, did all of that  
18 occur in the late summer, early fall of 2002?

19 A. Repeat that.

20 Q. You testified earlier today that at  
21 some point Mr. Meade would ask you about what  
22 kind of underwear you wore, that he would tell  
23 you you looked pretty and that he told you you  
24 would look nice in a bikini on his boat. All  
25 of those things occurred in late summer, early



1 fall 2002; is that correct?

2 A. Whatever this says is whatever  
3 happened.

4 Q. You're indicating what the Exhibit says  
5 is what happened?

6 A. Yes.

7 Q. So if the Exhibit differs in time frame  
8 from what your testimony was today, we are to  
9 take what's contained in the Exhibit as more  
10 truthful?

11 A. Yes.

12 Q. And more accurate?

13 A. Yes.

14 Q. Would you turn to the third page of  
15 Exhibit 1, please? Would you start looking  
16 here (indicating)? I'm going to read from the  
17 Exhibit.

18 "The following day after work my  
19 husband called Larry from our phone at home."

20 First of all, what day are you  
21 referring to here?

22 A. It's Monday or Tuesday.

23 Q. That would be Monday or Tuesday  
24 following the Sunday that Larry had come to  
25 your house?

1           A. That he said about Morrison's Funeral  
2 Home and that Larry said that he didn't think  
3 that would really bother me that much  
4 mentioning Morrison Funeral Home.

5           Q. A couple of lines down, the sentence  
6 begins, "On June 3rd at work." Do you see  
7 that?

8           A. Yes.

9           Q. I'm going to read from the Exhibit.  
10           "On June 3rd at work I went in to clean  
11 a men's restroom. I had severe flashbacks of  
12 him being in that restroom. I couldn't handle  
13 it and I had an emotional breakdown."

14           Did I read that correctly?

15           A. Yes.

16           Q. There is a gap in time, wouldn't you  
17 say, between your recording of events here?  
18 Right before the paragraph that starts "On June  
19 3rd," you were writing about what was happening  
20 in early March; correct?

21           A. Ah-huh.

22           Q. Did anything happen between March and  
23 June that is not reflected in this document?

24           A. No.

25           Q. Did you have any meetings with anyone

1 in human resources at Joy between the date that  
2 Larry Meade came to your house on that Sunday  
3 and your June 3rd breakdown?

4 A. Yes, but I don't remember what days.

5 Q. You don't remember what days?

6 A. No.

7 Q. Were those meetings -- did you have  
8 more than one meeting with HR?

9 A. Yeah.

10 Q. Was the first meeting scheduled by  
11 Harold?

12 A. Yes.

13 Q. When you came to work that day, did you  
14 know you were going to have a meeting with HR  
15 to discuss Larry Meade?

16 A. No.

17 Q. Did Harold tell you that a meeting had  
18 been scheduled?

19 A. Yes.

20 Q. Did he tell you when?

21 A. Yes.

22 Q. When did he tell you it had been  
23 scheduled?

24 A. At lunchtime.

25 Q. I think I'm not asking this question

1 she took me in the building; and she knew  
2 everything about the death of Justin and  
3 everything like that; and she went and got  
4 Cornelia; and Johan took me into Johan's office  
5 and had Cornelia talk to me for a little while;  
6 and then when that was going on, they -- I  
7 didn't realize what they were doing, but they  
8 were calling Harold.

9 Q. Did Debbie leave when she brought you  
10 to Johan's office?

11 A. Yes.

12 Q. Was Johan in his office?

13 A. I don't remember.

14 Q. You remember Cornelia being brought to  
15 you?

16 A. Yes.

17 Q. Were you seated in a chair?

18 A. Yes.

19 Q. Where was Cornelia?

20 A. She was kneeling down in front of me.

21 Q. What did you tell Cornelia?

22 A. I tried telling her about what Larry  
23 had done to me; and she couldn't understand  
24 what I was saying.

25 Q. What do you mean you tried to tell

1 Cornelia what Larry had done to you, that  
2 Sunday?

3 A. Any time.

4 Q. The Sunday before?

5 A. Yeah, the Sunday before. Just  
6 everything.

7 Q. Everything?

8 A. Yeah; and I couldn't get it out. I was  
9 crying too hard.

10 Q. Were you trying to tell her about the  
11 hugs?

12 A. Yes.

13 Q. Were you trying to tell her about the  
14 kiss?

15 A. Yes.

16 Q. Were you trying to tell her about his  
17 hands on the top of your butt?

18 A. Yes.

19 Q. But you couldn't get it out?

20 A. I couldn't get it out.

21 Q. What did you get out?

22 A. Just the words "Larry Meade being  
23 mean."

24 Q. "Larry Meade being mean"?

25 A. Yeah, that's all I got out as far as I

1 know.

2 Q. What happened then?

3 A. She just kept telling me to calm down,  
4 calm down, calm down; kept hugging me. By then  
5 Harold was there.

6 Q. Then what happened?

7 A. They left Harold with me for a while  
8 and he settled me down.

9 Q. What did you tell Harold? You and  
10 Harold were left alone in Johan's office?

11 A. Yes.

12 Q. What did you and Harold discuss when  
13 you were alone in Johan's office?

14 A. What I had done in the morning.

15 Q. Meaning calling Mrs. Meade?

16 A. Yeah.

17 Q. That's all you discussed?

18 A. Yeah.

19 Q. Did Harold ask you why you were at  
20 work?

21 A. Yeah.

22 Q. What did you tell him?

23 A. I told him I was coming to beat up  
24 Larry Meade.

25 Q. What did Harold say?

1 A. Yes.

2 Q. And when you say "nothing happened in  
3 April," I presume you mean you had no contact  
4 with, no problems with, no instance relative to  
5 Larry Meade?

6 A. Correct.

7 Q. Did anything happen in May of 2003?

8 A. He may have talked to me, but I don't  
9 exactly remember.

10 Q. If something bad had happened in May of  
11 2003, would it have been reflected in this  
12 document?

13 A. Yeah.

14 Q. Okay. Do you see the page that starts  
15 "On June 3rd, 4th, 5th and 6th"? I'm just  
16 going to read it.

17 "On June 3rd, 4th, 5th and 6th I was in  
18 the Oil City psychiatric ward. I had a nervous  
19 breakdown and I wanted to end my life. Susan  
20 Stewart sent me to the hospital."

21 What happened that resulted in your  
22 having been admitted to the Oil City  
23 psychiatric ward?

24 A. Everything kept building up on me. I  
25 kept thinking about everything, kept thinking



1 about everything.

2 Q. You were just thinking about things  
3 between March and June --

4 A. Yeah.

5 Q. -- is that right? Nothing new  
6 happened, you were just thinking about the  
7 things that had happened; correct?

8 A. Yeah; and I just walked into the men's  
9 bathroom --

10 Q. Which one?

11 A. The one that was on the second floor  
12 near MIS.

13 -- and I just started crying, couldn't  
14 quit.

15 Q. What happened then?

16 A. I left everything, just walked away  
17 from everything and went downstairs to the  
18 maintenance room; and I called Wayne, my boss  
19 at that time, and told him I needed to go home;  
20 and he said that he didn't want me leaving, he  
21 would be down to talk to me, there was  
22 something in my voice that he knew wasn't  
23 right, don't leave.

24 Q. He said that to you?

25 A. Yeah. So he came down, sat down with

1 me; and I just told him that, I need to go  
2 home, I just need to go home. He said, well,  
3 I'm not letting you drive like this. You are  
4 not driving.

5 Q. What time of day was this?

6 A. It was in the morning. I'm going to  
7 say around 10.

8 Q. You hadn't seen Larry that day?

9 A. No.

10 Q. So there was nothing that Larry did  
11 that day to trigger this?

12 A. No.

13 Q. Why did you call Wayne and not Harold?

14 A. Because you have to call your  
15 supervisor to tell them you're leaving; and  
16 that's what my first indication was, I need to  
17 call him and tell him I'm leaving.

18 Q. What happened next?

19 A. He told me that he would take me home  
20 and that when he got back he would tell Harold  
21 that he took me home, that I wasn't able to  
22 drive, because he works in the same building  
23 that Harold does.

24 Q. Was that okay with you?

25 A. Yes.

1 Q. That plan was okay with you?

2 A. Yes.

3 Q. What happened then?

4 A. On the way to my house, I just started  
5 telling Wayne everything that happened.

6 Q. What do you mean "everything"?

7 A. Larry hugging me and walking in the  
8 restrooms and that he had tried to kiss me and  
9 he was at my house.

10 Q. Is that the first time that you had  
11 told Wayne anything about Larry Meade? Yes?

12 A. Yes.

13 Q. What happened then?

14 A. Harold came home and I told him  
15 everything.

16 Q. Is this first time -- did you tell  
17 Harold about the attempted kiss? Did you tell  
18 Harold about the hug with Larry's hands on the  
19 top of your butt?

20 MR. LINDSAY: You're nodding.  
21 You have to say yes.

22 A. Yes.

23 Q. Did you tell Harold about the mutual  
24 hugs?

25 A. Yes.

1 Q. Is that all you heard from that  
2 telephone conversation?

3 A. Yeah.

4 Q. Did you hear Harold say anything to the  
5 person on the other line that he felt you  
6 hadn't told them the whole story?

7 A. No.

8 Q. Did you hear Harold say, she enticed  
9 him?

10 A. No.

11 Q. You came back to work then in June of  
12 2003; correct? Did you have any contact with  
13 Larry Meade in June of 2003?

14 A. Do you mean physical contact or just --  
15 explain a little more.

16 Q. Let's start there. Did you have any  
17 physical contact with Larry Meade in June of  
18 2003?

19 A. No.

20 Q. Did you see him in June of 2003?

21 A. Yes.

22 Q. Did he speak to you?

23 A. No.

24 Q. In July of 2003, were you working?

25 A. Yes.

1 Q. Did you have any physical contact with  
2 Larry in July of 2003?

3 A. No.

4 Q. Did you see Larry in July of 2003?

5 A. Yes.

6 Q. Did you and Larry speak to each other  
7 in July of 2003?

8 A. No.

9 Q. Did he speak to you in July of 2003?

10 A. No.

11 Q. Did you file a grievance?

12 A. Yes.

13 Q. Let me back up a little bit, if I can.

14 In July of 2003, did you request that  
15 your work area be moved to Plant 1?

16 A. Yes.

17 MS. COCHENOUR: I ask that the  
18 court reporter mark this document as Exhibit 4.

19 (Deposition Exhibit No. 4 was  
20 marked for identification.)

21 Q. Did you prepare this document?

22 A. Yes.

23 Q. Did you type it at home?

24 A. Yes.

25 Q. Did you bring it to work on July 1st,

1 A. No.

2 Q. What result were you hoping for with  
3 this grievance?

4 A. That there would be more investigation  
5 done.

6 Q. At the time the grievance was filed,  
7 did you have any idea what investigation had  
8 been done?

9 A. Yes.

10 Q. How did you know?

11 A. I talked with Johan Maritz.

12 Q. What did Mr. Maritz tell you?

13 A. He told me that they had a meeting with  
14 Larry Meade and that he would not be in my area  
15 ever again, that I would not have to worry  
16 about seeing him around again or worry about  
17 it.

18 Q. Well, that's the result of the  
19 investigation. You testified that you were not  
20 happy with how the investigation had been  
21 conducted; correct?

22 A. Correct.

23 Q. So is it really that you were unhappy  
24 with the result of the investigation, not how  
25 the investigation was conducted?

1 A. Yes.

2 Q. Am I correct?

3 A. Yes.

4 Q. Okay. So it wasn't that you didn't  
5 think the company did a good enough job  
6 investigating your complaint, it was that you  
7 were uncomfortable with the fact that Larry  
8 Meade still worked at Joy; am I right?

9 A. No.

10 Q. What were you uncomfortable with? I'm  
11 trying to get this clear.

12 A. The whole situation, that I did report  
13 it and I felt enough was not done because my  
14 contract book reads that if anyone has been  
15 sexually harassing any employee, male or  
16 female, that there would be a full  
17 investigation done and that they would be  
18 terminated if necessary.

19 Q. Did you have any concerns that Joy had  
20 not conducted a full investigation?

21 A. Yes.

22 Q. Why? What made you come to that  
23 conclusion?

24 First, did you know who they  
25 interviewed?



1 A. Yes.

2 Q. How do you know?

3 A. Somebody told me.

4 Q. Who?

5 A. I don't remember.

6 Q. Somebody in HR?

7 A. No.

8 Q. Somebody who doesn't work in HR told  
9 you who HR investigated and spoke to in the  
10 investigation of your claim but you don't know  
11 who that person is?

12 A. No, I do not.

13 Q. You don't remember who it is?

14 A. I don't remember.

15 Q. You sat down with somebody who doesn't  
16 work in HR and that person said to you,  
17 Valerie, this is who they talked to in HR in  
18 the investigation of your claim? Are you  
19 telling me that's what happened?

20 A. Not in those exact words.

21 Q. Tell me what the words were.

22 A. They talked with four individuals.

23 Q. Who were they?

24 A. One of them was Peggy Doyle, Cornelia  
25 Adams; and I don't remember the other two.

1 Q. Did HR talk to Harold?

2 A. On what terms?

3 Q. Did HR talk to Harold about the  
4 situation with Larry?

5 A. I don't remember.

6 Q. Did HR talk to you?

7 A. Johan talked to me.

8 Q. Who else do you feel HR should have  
9 spoken to that they didn't in the course of the  
10 investigation?

11 A. A lot of people.

12 Q. Who?

13 A. Tom O'Neil.

14 Q. Who else?

15 A. Cecil Cassatt.

16 Q. Who else?

17 A. Debbie Lajeunesse.

18 Q. Who else?

19 A. Ellie Averille.

20 Q. Who else?

21 A. Jill Saylor.

22 Q. Who else?

23 A. Judy Peterson.

24 Q. Who else?

25 A. Bob Dahle.

1 Q. Who else?

2 A. I can't think of anybody else right now  
3 off the top of my head.

4 Q. Before June 20th of 2003, had you asked  
5 anyone at HR to speak with any of those people  
6 whose names you just mentioned?

7 A. No.

8 Q. What was the result of your grievance?  
9 What outcome did it have?

10 A. None.

11 Q. Was Harold assisting you in the  
12 presentation of your case?

13 A. Yes.

14 Q. Do you feel the union did everything  
15 possible to assist you in the presentation of  
16 your grievance?

17 A. No.

18 Q. Was Harold a member of the shop  
19 committee at the time your grievance was  
20 presented?

21 A. I don't remember.

22 Q. Do you feel that Harold is competent  
23 and capable as a union representative?

24 A. Yes.

25 Q. Do you feel Harold did a competent and

1 appropriate job in assisting in the  
2 presentation of your grievance?

3 A. Yes.

4 Q. Was one of the things that you wanted  
5 to happen as a result of your grievance that  
6 Larry Meade be fired?

7 A. Yes.

8 Q. Today is that still your wish, that  
9 Larry Meade be fired?

10 A. Yes.

11 Q. Since the time that your grievance was  
12 filed and today, have you had any problems with  
13 Larry Meade?

14 A. No.

15 Q. Let's kind of reposition these exhibits  
16 so we can get back to the journal.

17 Would you turn two more pages, the one  
18 that starts "August 1st."

19 MR. LINDSAY: They're out of  
20 order. Go ahead.

21 A. I don't have August 1st. Oh, here it  
22 is.

23 Q. This is where we have to start looking  
24 out for pages that are two-sided copies; okay,  
25 Valerie?